



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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ELM  
F. #2015F01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 11, 2018

By ECF and E-mail

Robert J. Cleary, Esq.  
Dietrich L. Snell, Esq.  
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Proskauer Rose LLP  
Eleven Times Square  
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

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Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's filter team hereby furnishes discovery with respect to the above-captioned matter. This disclosure supplements the filter team's earlier disclosures under cover of letters dated May 24, 2017, July 12, 2017, August 8, 2017, October 23, 2017, October 26, 2017, July 24, 2018 and October 9, 2018.

Enclosed are copies of additional emails sent to or received by the email account associated with the address "zhongdan515@msn.com" (the "Zhong Email Account"), beyond those previously produced, which bear Bates numbers DZFILTER00015586 through DZFILTER00015841. Please note that these materials may contain privileged attorney-client communications. The prosecution team has not reviewed these materials.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Elizabeth L. Macchiaverna  
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cc: Clerk of the Court (DLI) (by ECF)